

1 [Submitting Counsel on Signature Page]
2
3
4
5
6
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10

11 IN RE: SOCIAL MEDIA ADOLESCENT
12 ADDICTION/PERSONAL INJURY
13 PRODUCTS LIABILITY LITIGATION

14 This Document Relates to:
15 ALL ACTIONS
16
17

MDL No. 3047

Case No. 4:22-03047-YGR

**JOINT STIPULATION MODIFYING
TEMPORARY SEALING PROCEDURE
DEADLINE**

Judge: Hon. Yvonne Gonzalez Rogers

1 Plaintiffs¹ and Meta Platforms, Inc., Facebook Holdings, LLC, Facebook Operations,
 2 LLC, Facebook Payments, Inc., Facebook Technologies, LLC, Instagram LLC, and Siculus Inc.
 3 (“Meta Entities”); Snap Inc.; TikTok Inc. and ByteDance Inc. (“TikTok Entities”); and YouTube,
 4 LLC, Alphabet Inc., and Google LLC (“Google Entities”) (collectively “Defendants”) (together
 5 the “Parties”) by and through their counsel of record hereby submit this Joint Stipulation
 6 Modifying Temporary Sealing Procedure Deadline.

7 On April 15, 2024 the Parties each submitted their respective Briefs in Support of
 8 Bellwether Discovery Pool Selections. *See* ECF Nos. 754 and 755. Each Party also submitted a
 9 Temporary Sealing Motion pertaining to those briefs, and subsequently filed their briefs under
 10 seal on April 15, 2024. *See* ECF Nos. 756; 756-1; 757; 757-1.

11 Pursuant to the Court’s Order Setting Sealing Procedures (ECF No. 341), the Parties
 12 hereby stipulate to extend the time to file the Omnibus Sealing Stipulation to 21 days after the
 13 briefing was filed, May 6, 2024.

14
 15 DATED: May 3, 2024

Respectfully submitted,

16
 17 By: /s/ Previn Warren

18 PREVIN WARREN
 19 **MOTLEY RICE LLC**
 401 9th Street NW Suite 630
 Washington DC 20004
 Telephone: 202-386-9610
 pwarren@motleyrice.com

21 LEXI J. HAZAM
 22 **LIEFF CABRASER HEIMANN &**
 23 **BERNSTEIN, LLP**
 275 BATTERY STREET, 29TH FLOOR
 SAN FRANCISCO, CA 94111-3339
 Telephone: 415-956-1000
 lhazam@lchb.com

24
 25
 26 Co-Lead Counsel

27
 28 ¹ For the purposes of this stipulation, “Plaintiffs” refers to personal injury and school district
 Plaintiffs.

1 CHRISTOPHER A. SEEGER
2 **SEEGER WEISS, LLP**
3 55 CHALLENGER ROAD, 6TH FLOOR
4 RIDGEFIELD PARK, NJ 07660
Telephone: 973-639-9100
cseeger@seegerweiss.com

5 Counsel to Co-Lead Counsel

6 JENNIE LEE ANDERSON
7 **ANDRUS ANDERSON, LLP**
8 155 MONTGOMERY STREET, SUITE 900
9 SAN FRANCISCO, CA 94104
Telephone: 415-986-1400
jennie@andrusanderson.com

10 Liaison Counsel

11 EMILY C. JEFFCOTT
12 **MORGAN & MORGAN**
13 633 WEST FIFTH STREET, SUITE 2652
14 LOS ANGELES, CA 90071
Telephone: 213-787-8590
ejeffcott@forthepeople.com

15 JOSEPH VANZANDT
16 **BEASLEY ALLEN**
17 234 COMMERCE STREET
18 MONTGOMERY, LA 36103
Telephone: 334-269-2343
joseph.vanzandt@beasleyallen.com

19 Federal/State Liaisons

20
21 MATTHEW BERGMAN
GLENN DRAPER
22 **SOCIAL MEDIA VICTIMS LAW CENTER**
23 821 SECOND AVENUE, SUITE 2100
SEATTLE, WA 98104
Telephone: 206-741-4862
24 matt@socialmediavictims.org
glenn@socialmediavictims.org

25
26 JAMES J. BILSBORROW
27 **WEITZ & LUXENBERG, PC**
700 BROADWAY
NEW YORK, NY 10003
28 Telephone: 212-558-5500

1 jbilborrow@weitzlux.com

2 JAYNE CONROY
3 **SIMMONS HANLY CONROY, LLC**
4 112 MADISON AVE, 7TH FLOOR
5 NEW YORK, NY 10016
6 Telephone: 917-882-5522
7 jconroy@simmonsfirm.com

8 ANDRE MURA
9 **GIBBS LAW GROUP, LLP**
10 1111 BROADWAY, SUITE 2100
11 OAKLAND, CA 94607
12 Telephone: 510-350-9717
13 amm@classlawgroup.com

14 ALEXANDRA WALSH
15 **WALSH LAW**
16 1050 Connecticut Ave, NW, Suite 500
17 Washington D.C. 20036
18 Telephone: 202-780-3014
19 awalsh@alexwalshlaw.com

20 MICHAEL M. WEINKOWITZ
21 **LEVIN SEDRAN & BERMAN, LLP**
22 510 WALNUT STREET
23 SUITE 500
24 PHILADELPHIA, PA 19106
25 Telephone: 215-592-1500
26 mweinkowitz@lfsbalw.com

27 Plaintiffs' Steering Committee Leadership

28 RON AUSTIN
RON AUSTIN LAW
400 MANHATTAN BLVD.
HARVEY, LA 70058
Telephone: 504-227-8100
raustin@ronaustinlaw.com

PAIGE BOLDT
WALSH LAW
4 Dominion Drive, Bldg. 3, Suite 100
San Antonio, TX 78257
Telephone: 210-448-0500
PBoldt@alexwalshlaw.com

THOMAS P. CARTMELL

WAGSTAFF & CARTMELL LLP

4740 Grand Avenue, Suite 300
Kansas City, MO 64112
Telephone: 816-701-1100
tcartmell@wcllp.com

SARAH EMERY

HENDY JOHNSON VAUGHN EMERY PSC

600 WEST MAIN STREET, SUITE 100
LOUISVILLE, KT 40202
Telephone: 859-600-6725
semery@justicestartshere.com

CARRIE GOLDBERG

C.A. GOLDBERG, PLLC

16 Court St.
Brooklyn, NY 11241
Telephone: 646-666-8908
carrie@cagoldberglaw.com

RONALD E. JOHNSON, JR.

HENDY JOHNSON VAUGHN EMERY PSC

600 WEST MAIN STREET, SUITE 100
LOUISVILLE, KT 40202
Telephone: 859-578-4444
rjohnson@justicestartshere.com

SIN-TING MARY LIU

**AYLSTOCK WITKIN KREIS &
OVERHOLTZ, PLLC**

17 EAST MAIN STREET, SUITE 200
PENSACOLA, FL 32502
Telephone: 510-698-9566
mliu@awkolaw.com

JAMES MARSH

MARSH LAW FIRM PLLC

31 HUDSON YARDS, 11TH FLOOR
NEW YORK, NY 10001-2170
Telephone: 212-372-3030
jamesmarsh@marshlaw.com

JOSEPH E. MELTER
**KESSLER TOPAZ MELTZER & CHECK
LLP**

280 KING OF PRUSSIA ROAD
RADNOR, PA 19087
Telephone: 610-667-7706
jmeltzer@ktmc.com

HILLARY NAPPI
HACH & ROSE LLP

112 Madison Avenue, 10th Floor
New York, New York 10016
Telephone: 212-213-8311
hnappi@hrsclaw.com

EMMIE PAULOS
LEVIN PAPANTONIO RAFFERTY

316 SOUTH BAYLEN STREET, SUITE 600
PENSACOLA, FL 32502
Telephone: 850-435-7107
epaulos@levinlaw.com

RUTH THI RIZKALLA
THE CARLSON LAW FIRM, PC
1500 ROSECRANS AVE., STE. 500
MANHATTAN BEACH, CA 90266
Telephone: 415-308-1915
rrizkalla@carlsonattorneys.com

ROLAND TELLIS
DAVID FERNANDES
BARON & BUDD, P.C.
15910 Ventura Boulevard, Suite 1600
Encino, CA 91436
Telephone: 818-839-2333
rtellis@baronbudd.com
dfernandes@baronbudd.com

MELISSA YEATES
**KESSLER TOPAZ MELTZER & CHECK
LLP**

280 KING OF PRUSSIA ROAD
RADNOR, PA 19087
Telephone: 610-667-7706
myeates@ktmc.com

DIANDRA “FU” DEBROSSE
ZIMMERMANN
DICELLO LEVITT

505 20th St North
Suite 1500
Birmingham, Alabama 35203
Telephone: 205-855-5700
fu@dicellolevitt.com

Plaintiffs’ Steering Committee Membership

Attorneys for Individual Plaintiffs

COVINGTON & BURLING LLP

By: /s/ Ashley M. Simonsen
Ashley M. Simonsen, SBN 275203
COVINGTON & BURLING LLP
1999 Avenue of the Stars
Los Angeles, CA 90067
Telephone: (424) 332-4800
Facsimile: + 1 (424) 332-4749
Email: asimonsen@cov.com

Phyllis A. Jones, *pro hac vice*
Paul W. Schmidt, *pro hac vice*
COVINGTON & BURLING LLP
One City Center
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: + 1 (202) 662-6000
Facsimile: + 1 (202) 662-6291
Email: pajones@cov.com

*Attorney for Defendants Meta Platforms, Inc.
f/k/a Facebook, Inc.; Facebook Holdings,
LLC; Facebook Operations, LLC; Facebook
Payments, Inc.; Facebook Technologies, LLC;
Instagram, LLC; Siculus, Inc.; and Mark Elliot*

1 *Zuckerberg*

2 FAEGRE DRINKER LLP

3 By: /s/ Andrea Roberts Pierson

4 Andrea Roberts Pierson, *pro hac vice*

5 FAEGRE DRINKER LLP

6 300 N. Meridian Street, Suite 2500

7 Indianapolis, IN 46204

8 Telephone: + 1 (317) 237-0300

9 Facsimile: + 1 (317) 237-1000

10 Email: andrea.pierson@faegredrinker.com

11 Email: amy.fiterman @faegredrinker.com

12 Amy R. Fiterman, *pro hac vice*

13 FAEGRE DRINKER LLP

14 2200 Wells Fargo Center

15 90 South Seventh Street

16 Minneapolis, MN 55402

17 Telephone: +1 (612) 766-7768

18 Facsimile: +1 (612) 766-1600

19 Email: amy.fiterman@faegredrinker.com

20 Geoffrey Drake, *pro hac vice*

21 KING & SPALDING LLP

22 1180 Peachtree Street, NE, Suite 1600

23 Atlanta, GA 30309

24 Tel.: 404-572-4600

25 Email: gdrake@kslaw.com

26 Email: dmatern@kslaw.com

27 David Mattern, *pro ha vice*

28 KING & SPALDING LLP

1700 Pennsylvania Avenue, NW, Suite 900

Washington, D.C. 20006

Telephone: +1 (202) 626-2946

Email: dmatern@kslaw.com

*Attorneys for Defendants TikTok Inc. and
ByteDance Inc.*

MUNGER, TOLLES & OLSEN LLP

By: /s/ Jonathan H. Blavin

Jonathan H. Blavin, SBN 230269

MUNGER, TOLLES & OLSON LLP

560 Mission Street, 27th Floor

San Francisco, CA 94105-3089

Telephone: (415) 512-4000

Facsimile: (415) 512-4077

Email: jonathan.blavin@mto.com

Rose L. Ehler (SBN 29652)
Victoria A. Degtyareva (SBN 284199)
Laura M. Lopez, (SBN 313450)
Ariel T. Teshuva (SBN 324238)
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, 50th Floor
Los Angeles, CA 90071-3426
Telephone: (213) 683-9100
Facsimile: (213) 687-3702
Email: rose.ehler@mto.com
Email: victoria.degtyareva@mto.com
Email: Ariel.Teshuva@mto.com

Lauren A. Bell (*pro hac vice forthcoming*)
MUNGER, TOLLES & OLSON LLP
601 Massachusetts Ave., NW St.,
Suite 500 E
Washington, D.C. 20001-5369
Telephone: (202) 220-1100
Facsimile: (202) 220-2300
Email: lauren.bell@mto.com

Attorneys for Defendant Snap Inc.

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
By: /s/ Brian M. Willen
Brian M. Willen
WILSON SONSINI GOODRICH & ROSATI
1301 Avenue of the Americas, 40th Floor
New York, New York 10019
Telephone: (212) 999-5800
Facsimile: (212) 999-5899
Email: bwillen@wsgr.com

Lauren Gallo White
Samantha A. Machock
WILSON SONSINI GOODRICH & ROSATI
One Market Plaza, Spear Tower, Suite 3300
San Francisco, CA 94105
Telephone: (415) 947-2000
Facsimile: (415) 947-2099
Email: lwhite@wsgr.com
Email: smachock@wsgr.com

1 Christopher Chiou
2 WILSON SONSINI GOODRICH & ROSATI
3 633 West Fifth Street
4 Los Angeles, CA 90071-2048
5 Telephone: (323) 210-2900
6 Facsimile: (866) 974-7329
7 Email: cchiou@wsgr.com

8 *Attorneys for Defendants YouTube, LLC,*
9 *Google LLC, and Alphabet Inc.*

10 WILLIAMS & CONNOLLY LLP

11 By: /s/ Joseph G. Petrosinelli

12 Joseph G. Petrosinelli

13 jpetrosinelli@wc.com

14 Ashley W. Hardin

15 ahardin@wc.com

16 680 Maine Avenue, SW

17 Washington, DC 20024

18 Telephone.: 202-434-5000

19 Fax: 202-434-5029

20 *Attorneys for Defendants YouTube, LLC, Google*
21 *LLC, and Alphabet Inc.*

ATTESTATION

I, Previn Warren, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: May 3, 2024

/s/ Previn Warren

Previn Warren